

March 15, 2017

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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593

Dear Ms. Dortch:

On March 13, 2017, Michael B. Galvin and Samuel Kline of Granite Telecommunications, LLC and the undersigned met with Nicholas Degani (by telephone) and Jay Schwarz of the Chairman's office, and separately with Amy Bender of Commissioner O'Rielly's office. During the meetings, Granite discussed the importance of maintaining a reasonable transition timeframe for the interim rule that incumbent LECs seeking Section 214 authority to discontinue a TDM-based commercial wholesale platform voice service that is currently used as a wholesale input by competitive carriers must provide competitive carriers with reasonably comparable access on reasonably comparable rates, terms, and conditions.¹

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder
Counsel for Granite Telecommunications, LLC

cc: Nicholas Degani
Jay Schwarz
Amy Bender

¹ 47 CFR § 63.71(d). See Letter from Thomas Jones, Counsel for Granite, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 13-5, 12-353, WC Docket Nos. 05-25, 16-143, RM-11358, RM-10593 (Oct. 18, 2016).